

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	
-vs-	:	No. 3:23-CR-127
	:	
THOMAS TROTTA,	:	(Judge Mannion)
	:	
Defendant	:	

MOTION TO WITHDRAW AS COUNSEL

AND NOW comes Joseph R. D'Andrea, Esq., counsel for Thomas Trotta, and hereby motions this Honorable Court to withdraw as his legal counsel and avers as follows:

1. On May 22, 2023, the United States Attorney for the Middle District of Pennsylvania filed a felony Information, charging Defendant Thomas TROTTA with one violation of 18 U.S.C. §§668 and 2, Theft of Major Artwork, Aid and Abet;
2. The Defendant pleaded guilty before the Honorable Malachy Mannion on July 5, 2023;
3. The Defendant was sentenced to a period of incarceration of ninety-four (94) months by this Honorable Court on March 13, 2025;

4. The Defendant believes that there are certain issues to raise on appeal;

5. The undersigned Counsel was not engaged to handle any appellate work of the Defendant;

6. The undersigned Counsel is not presently admitted to practice in the Third Circuit Court of Appeals;

7. The undersigned Counsel has not had a practice of appellate work and is inexperienced in this area, though his practice at a trial level has been dedicated to criminal defense;

8. The Defendant has been substantially incarcerated for the past six (6) years and is without financial resources;

9. Because of the Defendant's financial condition, it is requested that the Court appoint a member of the Criminal Justice Act (CJA) Panel to represent the Defendant;

WHEREFORE, the Defendant respectfully requests an Order allowing the undersigned Counsel to withdraw as counsel.

Respectfully submitted,

Date: March 25, 2025

/s/ Joseph R. D'Andrea
JOSEPH R. D'ANDREA, Esq
Attorney for Thomas Trotta

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Defendant.	:	

CERTIFICATE OF SERVICE

I, Joseph R. D'Andrea, do hereby certify that this document, the foregoing Motion, have been electronically serviced via e-mail, including the following:

James M. Buchanan, Esq.
Assistant United States Attorney
U.S. Attorney's Office, Middle District of Pennsylvania
235 N. Washington Avenue, Suite 311
Scranton, PA 18503
James.Buchannan@usdoj.gov

And by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Thomas Trotta

Joseph R. D'Andrea
JOSEPH R. D'ANDREA, ESQ.
Attorney for Thomas Trotta

Date: 25 March 2025

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CERTIFICATE OF CONCURRENCE

I, Joseph R. D'Andrea, Counsel for the Defendant, contacted the Assistant United States Attorney, James Buchanan, to discuss the foregoing Motion wherein he indicated that the Government does concur in the same at this time.

Date: 25 March 2025

Joseph R. D'Andrea
JOSEPH R. D'ANDREA, ESQ.
Attorney for Thomas Trotta